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9 Attorneys for Plaintiff JENS ERIK SORESENSEN,  
10 as Trustee of SORESENSEN RESEARCH AND  
11 DEVELOPMENT TRUST

12  
13 UNITED STATES DISTRICT COURT  
14 FOR THE SOUTHERN DISTRICT OF CALIFORNIA  
15

16 JENS ERIK SORESENSEN, as Trustee of ) Case No. 07cv02278 BTM CAB  
17 SORESENSEN RESEARCH AND )  
18 DEVELOPMENT TRUST, ) **SECOND AMENDED NOTICE OF**  
19 ) **RELATED CASES**  
Plaintiff )  
20 v. )  
21 HELEN OF TROY TEXAS )  
22 CORPORATION; OXO )  
23 INTERNATIONAL LTD.; )  
and DOES 1 – 100, )  
24 Defendants. )  
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1 Pursuant to Local Civil Rule 40.1(e), Plaintiff JENS E. SORENSEN, as  
2 TRUSTEE OF THE SORENSEN RESEARCH AND DEVELOPMENT TRUST  
3 (“SRDT”), hereby gives SECOND AMENDED notice of cases related to the present  
4 case. Specifically, SRD TRUST gives notice of the following related cases that all  
5 arise from alleged infringement of United States Patent Number 4,935,184 (“the ‘184  
6 patent”), whether pending, dismissed, or otherwise terminated:

7 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*  
8 *Trust v. Central Purchasing, LLC, et al.*, Case No. 08cv309, filed February 15, 2008  
9 in the United States District Court for the District of Southern California. Plaintiff  
10 alleges infringement of the ‘184 patent by Defendants. Consolidation is not  
11 recommended because this related case involves different parties and has different  
12 products at issue.

13 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*  
14 *Trust v. Logitech, Inc., et al.*, Case No. 08cv308, filed February 15, 2008 in the  
15 United States District Court for the District of Southern California. Plaintiff alleges  
16 infringement of the ‘184 patent by Defendants. Consolidation is not recommended  
17 because this related case involves different parties and has different products at issue.

18 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*  
19 *Trust v. Metabo Corporation, et al.*, Case No. 08cv304, filed February 15, 2008 in  
20 the United States District Court for the District of Southern California. Plaintiff  
21 alleges infringement of the ‘184 patent by Defendants. Consolidation is not  
22 recommended because this related case involves different parties and has different  
23 products at issue.

24 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*  
25 *Trust v. Rally Manufacturing, Inc., et al.*, Case No. 08cv302, filed February 15, 2008  
26 in the United States District Court for the District of Southern California. Plaintiff  
27 alleges infringement of the ‘184 patent by Defendants. Consolidation is not  
28 recommended because this related case involves different parties and has different

1 products at issue.

2 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*  
3 *Trust v. Sunbeam Products, Inc., et al.*, Case No. 08cv306, filed February 15, 2008 in  
4 the United States District Court for the District of Southern California. Plaintiff  
5 alleges infringement of the '184 patent by Defendants. Consolidation is not  
6 recommended because this related case involves different parties and has different  
7 products at issue.

8 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*  
9 *Trust v. Star Asia, U.S.A., LLC, et al.*, Case No. 08cv307, filed February 15, 2008 in  
10 the United States District Court for the District of Southern California. Plaintiff  
11 alleges infringement of the '184 patent by Defendants. Consolidation is not  
12 recommended because this related case involves different parties and has different  
13 products at issue.

14 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*  
15 *Trust v. CTT Tools, Inc., et al.*, Case No. 08cv231, filed February 5, 2008 in the  
16 United States District Court for the District of Southern California. Plaintiff alleges  
17 infringement of the '184 patent by Defendants. Consolidation is not recommended  
18 because this related case involves different parties and has different products at issue.

19 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*  
20 *Trust v. Global Machinery Company, et al.*, Case No. 08cv233, filed February 5,  
21 2008 in the United States District Court for the District of Southern California.  
22 Plaintiff alleges infringement of the '184 patent by Defendants. Consolidation is not  
23 recommended because this related case involves different parties and has different  
24 products at issue.

25 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*  
26 *Trust v. Emissive Energy Corp., et al.*, Case No. 08cv234, filed February 5, 2008 in  
27 the United States District Court for the District of Southern California. Plaintiff  
28 alleges infringement of the '184 patent by Defendants. Consolidation is not

1 recommended because this related case involves different parties and has different  
2 products at issue.

3 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*  
4 *Trust v. Alltrade Tools, LLC., et al.*, Case No. 08cv232, filed February 5, 2008 in the  
5 United States District Court for the District of Southern California. Plaintiff alleges  
6 infringement of the '184 patent by Defendants. Consolidation is not recommended  
7 because this related case involves different parties and has different products at issue.

8 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*  
9 *Trust v. Motorola, Inc., et al.*, Case No. 3:08-cv-0136 LAB RBB, filed January 23,  
10 2008 in the United States District Court for the District of Southern California.  
11 Plaintiff alleges infringement of the '184 patent by Defendants. Consolidation is not  
12 recommended because this related case involves different parties and has different  
13 products at issue.

14 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*  
15 *Trust v. Sanyo North America Corporation, et al.*, Case No. 3:08-cv-0135 DMS  
16 POR, filed January 23, 2008 in the United States District Court for the District of  
17 Southern California. Plaintiff alleges infringement of the '184 patent by Defendants.  
18 Consolidation is not recommended because this related case involves different  
19 parties and has different products at issue.

20 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*  
21 *Trust v. Informatics, inc., et al.*, Case No. 3:08-cv-0134-L NLS, filed January 23,  
22 2008 in the United States District Court for the District of Southern California.  
23 Plaintiff alleges infringement of the '184 patent by Defendants. Consolidation is not  
24 recommended because this related case involves different parties and has different  
25 products at issue.

26 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*  
27 *Trust v. Ryobi Technologies, Inc., et al.*, Case No. 3:08-cv-0070-BTM-CAB, filed  
28 January 11, 2008 in the United States District Court for the District of Southern

1 California. Plaintiff alleges infringement of the '184 patent by Defendants.  
2 Consolidation is not recommended because this related case involves different  
3 parties and has different products at issue.

4 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*  
5 *Trust v. Senco Products, Inc.*, Case No. 3:08-cv-0071-BTM-CAB, filed January 11,  
6 2008 in the United States District Court for the District of Southern California.  
7 Plaintiff alleges infringement of the '184 patent by Defendants. Consolidation is not  
8 recommended because this related case involves different parties and has a single  
9 different product at issue.

10 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*  
11 *Trust v. Emerson Electric Co., et al*, Case No. 3:08-cv-0060-BTM-CAB, filed  
12 January 10, 2008 in the United States District Court for the District of Southern  
13 California. Plaintiff alleges infringement of the '184 patent by Defendants.  
14 Consolidation is not recommended because this related case involves different  
15 parties and has different products at issue.

16 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*  
17 *Trust v. Johnson Level & Tool Mfg. Co., Inc.*, Case No. 3:08-cv-0025-BTM-CAB,  
18 filed January 4, 2008 in the United States District Court for the District of Southern  
19 California. Plaintiff alleges infringement of the '184 patent by Defendants.  
20 Consolidation is not recommended because this related case involves different  
21 parties and has different, unrelated products at issue.

22 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*  
23 *Trust v. Lexar Media, Inc.*, Case No. 5:08-cv-00095-JW, filed January 7, 2008 in the  
24 United States District Court for the District of Northern California. Plaintiff alleges  
25 infringement of the '184 patent by Defendants. Consolidation is not recommended  
26 because this related case involves different parties and has different unrelated  
27 products at issue.

28 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*

1 *Trust v. Ampro Tools Corporation*, Case No. 4:08-cv-00096-CW, filed January 7,  
2 2008 in the United States District Court for the District of Northern California.  
3 Plaintiff alleges infringement of the '184 patent by Defendants. Consolidation is not  
4 recommended because this related case involves different parties and has different,  
5 unrelated products at issue.

6 *PowerStation LLC, et al v. Sorensen Research and Development Trust*, Case  
7 No. 07-cv-04167-RBH, filed December 31, 2007 in the United States District Court  
8 for the District of South Carolina. Plaintiff seeks declaratory judgment that the '184  
9 patent is invalid and not infringed by them, and also makes an unfair trade practices  
10 claim. Consolidation is not recommended because case involves different parties  
11 and different products, and adds a state law cause of action.

12 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*  
13 *Trust v. Energizer Holdings, Inc., et al*, Case No. 3:07-CV-2321-BTM-CAB, filed  
14 December 11, 2007 in the United States District Court for the Southern District of  
15 California. Consolidation is not recommended because this related case involves  
16 different parties and has different, unrelated products at issue.

17 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*  
18 *Trust v. Giant International, Inc., et al*, Case No. 3:07-CV-2121-BTM-CAB, filed  
19 November 6, 2007 in the United States District Court for the Southern District of  
20 California. Consolidation is not recommended because this related case involves  
21 different parties and has different, unrelated products at issue.

22 *Jens Erik Sorensen as Trustee of Sorensen Research and Development Trust v.*  
23 *Esseplast (USA) NC, Inc., et al*, Case No. 3:07-cv-2277-BTM-CAB, filed December  
24 4, 2007 in this District. Consolidation is not recommended because this related case  
25 involves different parties and has different, unrelated products at issue.

26 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*  
27 *Trust v. First International Digital, Inc., et al*, Case No. 3:07-cv-5525-JSW, filed  
28 October 30, 2007 in the United States District Court for the Northern District of

1 California. Consolidation is not recommended because this related case involves  
2 different parties and has different, unrelated products at issue.

3 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*  
4 *Trust v. Digital Networks North America, Inc., et al*, Case No. 3:07-5568-JSW, filed  
5 November 1, 2007 in the United States District Court for the Northern District of  
6 California. Consolidation is not recommended because this related case involves  
7 different parties and has different, unrelated products at issue.

8 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*  
9 *Trust v. The Black & Decker Corporation, et al*, Civil Case No.: 3:06-CV-1572-  
10 BTM-CAB, filed August 7, 2006, in the United States District Court for the Southern  
11 District of California. Consolidation is not recommended because this related case  
12 involves different parties and has different, unrelated products at issue.

13 *American Safety Razor Co. v. Sorensen Research & Development Trust*, Civil  
14 Case No. 07-CV-00730-HHK, filed April 20, 2007, in the United States District  
15 Court for the District of Columbia. Consolidation is not recommended because this  
16 related case involves different parties and has different, unrelated products at issue.

17 *DMS Holdings, Inc. v. Sorensen Research & Development Trust*. Civil Case  
18 No.: 07-CV-02690, filed May 11, 2007, in the United States District Court for the  
19 Northern District of Illinois. Consolidation is not recommended because this related  
20 case involves different parties and has different, unrelated products at issue.

21 *Jens Erik Sorensen as Trustee of the Sorensen Research And Development*  
22 *Trust v. Tecnica USA, Inc and Nordica USA, Inc.*, Civil Case No. 06CV1941 B  
23 MLS, filed September 18, 2006 in the Southern District of California. The action  
24 was settled by the parties, and dismissed.

25 *Jens Erik Sorensen As Trustee of The Sorensen Research And Development*  
26 *Trust v. Head USA Inc.* Civil Case No.: 06CV1434BTN CAB, filed July 2006 in  
27 the Federal District for the Southern District of California. The action was settled by  
28 the parties, and dismissed.



1           *Head USA Inc. v. Jens Erik Sorensen (As Trustee of The Sorensen Research*  
2           *And Development Trust), and Sorensen Research And Development Trust.* Docket  
3           No.: 306CV00983, filed June 2006 in the Federal District of Connecticut. The matter  
4           was transferred and consolidated with the *Sorensen Research And Development*  
5           *Trust v. Head USA Inc.* action filed in the Southern District of California, Civil Case  
6           No.: 06CV1434BTM CAB. The action was later settled by the parties, and  
7           dismissed.

8           *Nordica USA Corp. v. Jens Ole Sorensen, Jens Erik Sorensen, and Sorensen*  
9           *Research and Development Trust.* Docket No. 1:06-cv-91-JM filed March 8, 2006 in  
10          the Federal District of New Hampshire. The matter was transferred and consolidated  
11          with *Jens Erik Sorensen As Trustee of The Sorensen Research And Development*  
12          *Trust v. Tecnica USA, Inc and Nordica USA, Inc.,* Civil Case No. 06CV1941 B  
13          MLS, filed in the Southern District of California. The action was later settled by the  
14          parties.

15          *Jens Ole Sorensen, and Jens E. Sorensen, as Trustee Of The Sorensen*  
16          *Research and Development Trust v. DaimlerChrysler AG, and Mercedes-Benz USA,*  
17          *LLC.* Civil No. 03-1763 (HAA) filed in the United States District Court for  
18          Northern California and transferred to the United States District Court for New  
19          Jersey. This matter has been settled and dismissed.

20          *In the Matter of Certain Automobile Tail Light Lenses And Products*  
21          *Incorporating Same.* Investigation No. 337-TA-502 filed in the United States  
22          International Trade Commission. The matter was remanded after appeal to the  
23          Federal Circuit Court of Appeals, then settled and dismissed.

24          *Jens E. Sorensen, as Trustee Of The Sorensen Research and Development*  
25          *Trust v. Premier Automotive Group, Ford Motor Company, and Jaguar, Ltd.* Case  
26          No. 03-cv-01107, filed March 14, 2003 in the Federal Court for the Northern District  
27          of California. The matter was settled and dismissed.

28          *Lowe's Companies, Inc., et al v. Sorensen Research and Development Trust.*



1 Case No. 05-cv-00234 filed July 29, 2005 in the Federal Court for the Western  
2 District of North Carolina. The matter was never served and was dismissed.

3 *Digital Innovations LLC v. Sorensen Research and Development Trust.* Case  
4 No. 05-cv-06428, filed November 9, 2005 in the Federal Court for the Northern  
5 District of Illinois. The matter was never served and was dismissed.

6 *Big Lots v. Sorensen Research and Development Trust.* Case No. 2:06-cv-  
7 1089, filed December 29, 2006 in the Federal Court for the Southern District of  
8 Ohio. The matter was never served and was dismissed.

9 *Bon-Aire v. Sorensen Research and Development Trust.* Case No. 07-cv-054-  
10 S, filed January 2007 in the Federal Court for the District of Idaho. The matter was  
11 never served and was dismissed.

12 *Husqvarna Outdoor Products, Inc. v. Sorensen Research and Development*  
13 *Trust.* CIV. NO. CV106-160 in the Federal Court for the Southern District of  
14 Georgia on October 30, 2006. The matter was never served and was dismissed.

15 *Sorensen et al v. International Trade Commission et al.* 427 F.3d 1375  
16 (Fed.Cir., 2005). After the Federal Circuit ruled in patentee's favor, the parties  
17 settled and dismissed.

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20 DATED this Tuesday, February 26, 2008.

21 JENS ERIK SORENSEN, as Trustee of  
22 SORENSEN RESEARCH AND DEVELOPMENT  
23 TRUST, Plaintiff

24 /s/ Melody A. Kramer

25 \_\_\_\_\_  
26 Melody A. Kramer, Esq.  
27 J. Michael Kaler, Esq.  
28 Attorneys for Plaintiff

**PROOF OF SERVICE**

I, Melody A. Kramer, declare: I am and was at the time of this service working within in the County of San Diego, California. I am over the age of 18 year and not a party to the within action. My business address is the Kramer Law Office, Inc., 9930 Mesa Rim Road, Suite 1600, San Diego, California, 92121.

On February 26, 2008, I served the following documents:

**SECOND AMENDED NOTICE OF RELATED CASES**

<b>PERSON(S) SERVED</b>	<b>PARTY(IES) SERVED</b>	<b>METHOD OF SERVICE</b>
Erik B. Von Ziepel Seyfarth Shaw LLP 2029 Century Park East, Suite 3300 Los Angeles, CA 90067 evonzeipel@seyfarth.com	Helen of Troy Texas Corporation; Oxo International Ltd.	Email--Pleadings Filed with the Court via CM/ECF

- ☐ (Personal Service) I caused to be personally served in a sealed envelope hand-delivered to the office of counsel during regular business hours.
- ☐ (Federal Express) I deposited or caused to be deposited today with Federal Express in a sealed envelope containing a true copy of the foregoing documents with fees fully prepaid addressed to the above noted addressee for overnight delivery.
- ☐ (Facsimile) I caused a true copy of the foregoing documents to be transmitted by facsimile machine to the above noted addressees. The facsimile transmissions were reported as complete and without error.
- ☐ (Email) I emailed a true copy of the foregoing documents to an email address represented to be the correct email address for the above noted addressee.
- ☒ (Email--Pleadings Filed with the Court) Pursuant to Local Rules, I electronically filed this document via the CM/ECF system for the United States District Court for the Southern District of California.

☐ (U.S. Mail) I mailed a true copy of the foregoing documents to a mail address represented to be the correct mail address for the above noted addressee.

I declare that the foregoing is true and correct, and that this declaration was executed on Tuesday, February 26, 2008, in San Diego, California.

/s./ Melody A. Kramer

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Melody A. Kramer